

IN THE SUPERIOR COURT OF CAMDEN COUNTY
STATE OF GEORGIA

Civil Action File no. 1300988

ERIC DOVE
Plaintiff,
v.

CHARLES FRANCIS GRANTIER, and
CRETE CARRIER CORP.
Defendants.

RECEIVED OCT 17 2013

SUMMONS:
PERSONAL SERVICE
IMPORTANT

THE STATE OF GEORGIA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this Summons and a copy of the Complaint in this lawsuit on the Defendant:

Tonn Ostergard, President of
Crete Carrier Corporation
400 NW 56th St.
Lincoln, Nebraska 68528

WITNESS my hand and the seal of this Court on 1st of October, 2013.

(SEAL)

CLERK OF THE CIRCUIT COURT

By: [Signature]
As Deputy Clerk

Persons with disabilities requesting reasonable accommodations to participate in this proceeding should contact (352) 374-3639 (voice & TDD) or via Florida Relay Service at (800) 955-8771.

[Signature]
EXHIBIT "A"

IMPORTANT

A lawsuit has been filed against you. You have twenty (20) calendar days after this Summons is served on you to file a written response to the attached Complaint with the Clerk of this Circuit Court, located at: 501 West Adams Street, Jacksonville, Florida, 32202. A telephone call will not protect you; your written response, including the above case number given above and the names of the parties, must be filed if you want the Court to hear your case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book.)

If you choose to file a written response yourself, at the same time you file your written response to the Court, you must also mail or take a carbon copy or photocopy of your written response to the "Plaintiff's Attorney" named below.

RONALD E. SHOLES, P.A.

4981 Atlantic Blvd.

Jacksonville, FL 32207

PH: 904-721-7575/ FAX: 721-7474

IMPORTANT

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Localizado en: 501 West Adams Street, Jacksonville, Florida, 32202. Una llamada telefonica no lo protegera; si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas en dicho caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales, si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff's Attorney" . (Demandante o Abogado del Demandante).

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IMPORTANT

Des poursuites juriciaries ont ete entreprises contre vous. Vous avez 20 jours consecutifs a partir de la date de l'assignation de cette citation pour deposter une response ecrite a la plainte ci-jointe aupres de ce tribunal. Qui se trouve a: 501 West Adams Street, Jacksonville, Florida, 32202. Un simple coup de telephone est insuffisant pour vous proteger; vous etes oblige do deposter votre response ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne deposez pas votre response ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requier les services immediate d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de renference d'avocats ou a un bureau d'assistance juridique (figuarant a l'annuaire de telephones).

Si vous choisissez de eposer vous-meme une response recrite il vous faudra egalement, en meme temps que cette formalite, faire parenvir ou expendier une copie au carbone ou one photocopies de votre response ecrite au "Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous.

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STATE OF GEORGIA

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ERIC DOVE
Plaintiff,

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STATE OF GEORGIA
CAMDEN SUPERIOR COURT

Filed 10/1/13 at 9:30 A.M.
[Signature] Clerk

COMPLAINT

COMES NOW, Plaintiff, ERIC DOVE by and through the undersigned counsel, and sues Defendants, CHARLES FRANCIS GRANTIER and CRETE CARRIER CORP. and states:

1. This is an action for damages in excess of \$15,000.00, exclusive of attorneys' fees, costs, and interest.
2. At all times material hereto Defendant, CHARLES FRANCIS GRANTIER, is a resident of Michigan and is subject to the jurisdiction and venue of this Court by virtue of operation of a vehicle in the State of Georgia, Camden County, and may be served with service of process pursuant to Georgia's Non-Resident Motorist Act at his address, 319 N. Burdick Street #12, Kalamazoo, Michigan 49007.
3. At all times material hereto, Defendant, CRETE CARRIER CORP. owned, operated, and maintained a trucking business at 400 North West 56th Street, Lincoln, Lancaster County, Nebraska 68501.
4. At all times material hereto, Defendant, CHARLES FRANCIS GRANTIER was an employee/agent of Defendant, CRETE CARRIER CORP.
5. At all times materials hereto, Defendant, CRETE CARRIER CORP. owned a truck bearing Nebraska Registration number 167713.

6. At all times material hereto, Plaintiff, ERIC DOVE was a resident of Fernandina Beach, Nassau County, Florida.

7. This court has jurisdiction.

COUNT I

8. On or about May 17, 2012, CHARLES FRANCIS GRANTIER operated the motor vehicle described in paragraph 5 with the knowledge and consent of Defendant, CRETE CARRIER CORP.

9. On or about May 17, 2012, CHARLES FRANCIS GRANTIER was in the course and scope of his employment as an agent/employee of Defendant, CRETE CARRIER CORP., when he negligently operated the motor vehicle described in paragraph 5 such that it collided with the vehicle in which Plaintiff, ERIC DOVE was driving on I-95, Kingsland, Camden County, Georgia.

10. As a direct and proximate result of the negligent driving actions of CHARLES FRANCIS GRANTIER, Plaintiff ERIC DOVE suffered permanent injuries within a reasonable degree of medical probability, resulting in associated pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life, expense of medical care and treatment, loss of earnings and other economic damages, loss of ability to earn money in the future, and/or aggravation of a previously existing condition. The losses are continuing and the Plaintiff will suffer losses into the future.

WHEREFORE, Plaintiff, ERIC DOVE demands judgment for damages against Defendant, CHARLES FRANCIS GRANTIER, together with costs, and further demands a trial by jury on all issues herein.

COUNT II

Plaintiff reasserts and realleges each and every allegation contained in paragraphs 1 through 10 above as if fully set forth herein and further allege:

11. Defendant, CRETE CARRIER CORP. is vicariously liable for Defendant, CHARLES FRANCIS GRANTIER's negligent driving actions pursuant to the dangerous instrumentality doctrine.

WHEREFORE, Plaintiff, ERIC DOVE, demands judgment for damages against Defendant, CRETE CARRIER CORP., together with costs, and further demands a trial by jury on all issues herein.


COUNT III

Plaintiff reasserts and realleges each and every allegation contained in paragraphs 1 through 11 above as if fully set forth herein and further allege:

12. Defendant, CRETE CARRIER CORP is vicariously liable for the negligent driving actions of its employee/agent, CHARLES FRANCIS GRANTIER, pursuant to the respondeat superior doctrine.

WHEREFORE, Plaintiff, ERIC DOVE, demands judgment for damages against Defendant, CRETE CARRIER CORP., together with costs, and further demands a trial by jury on all issues herein.

Respectfully submitted this 24 day of September, 2013.



SCOTT A. BURLEIGH (Ga. Bar No. 217736)
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